A-302

ATTACHMENT 9 POST CLOSURE PLAN



1.0 INTRODUCTION

Safety-Kleen Systems, Inc. (S-K) has been working with the Maryland Department of the Environment (MDE) to address residual impacts at the former service center located at 12164 Tech Road, Silver Spring, Maryland (Figure 1). The former Safety-Kleen facility functioned as a storage and distribution center for product and spent mineral spirits. The product mineral spirits were distributed to local customers for parts degreasing applications. Spent mineral spirits were later returned to the facility for short-term storage and transported to a Safety-Kleen solvent recycling facility. The Silver Spring service center operated between 1982 and 1996. Remediation and monitoring activities at the site (USEPA ID No. MOD000737395) are being implemented in accordance with Controlled Hazardous Substances Permit Number A-302 (Effective Date February 1, 2001).

Pursuant to COMAR 26.13.05.07, this post closure plan has been prepared to address the planned monitoring and maintenance activities during the post closure care period. Contact information for S-K during the post-closure care period is listed below:

Mr. Gerhard Risse Senior Remediation Manager Safety-Kleen Systems, Inc. 4810 South Old Peachtree Road Norcross, GA 30071 (770) 418-1860



2.0 SITE BACKGROUND

A total of eight (8) soil boring/monitoring wells (MW-1 through MW-8) have been installed at and adjacent to the site during several phases of investigative activities (Figure 2). Site monitoring wells have been inspected and sampled on a quarterly basis since installation. Groundwater samples have been analyzed for total petroleum hydrocarbons as mineral spirits (TPH-MS) and target volatile organic compounds (VOCs).

A SVE remediation system was installed at the site in August 1993. The remediation system consists of a network of ten (10) SVE points (VEP-1 through VEP-10), a 10 horsepower regenerative blower, 2 water knock-out tanks, 2 - 1,000-pound granular activated carbon (GAC) units, and appurtenant gauges, pipes, and valves. The SVE system has operated nearly continuously since installation, except when shut down for maintenance activities or during periodic power outages. Since reaching maximum mass recovery rates, the system has been operated on a pulsing scenario once a quarter.



3.0 POST CLOSURE MONITORING AND MAINTENANCE

During the post-closure care period, eight (8) on-site wells will be sampled on a semiannual basis. Each well will be analyzed for total petroleum hydrocarbons as mineral spirits, the only remaining site-related chemical of concern at the former S-K property. The results of the semiannual sampling will be documented in a report to the MDE including a description of the monitoring procedures, sampling results, summary tables, and figures. During the regularly scheduled groundwater monitoring events, well maintenance will be performed to ensure the wells are in good condition, and make any necessary repairs.

It is anticipated that groundwater at the former S-K site will be evaluated using a risk-based approach during the post-closure care period. Once the conditions of the risk-based closure are met, S-K will plug and abandon the wells in accordance with COMAR 26.04.04.11. The abandonment methods and certification will be provided to the MDE upon completion of the well and SVE point abandonment.



4.0 POST CLOSURE COST ESTIMATE

A post closure cost estimate has been prepared in accordance with COMAR 26.13.05.07 and 26.13.05.08. The post closure cost estimate has been included in Table 5, and includes groundwater monitoring, SVE system decommissioning, and well and SVE point plugging and abandonment. Based on the relatively stable nature of the groundwater impacts, S-K intends to perform groundwater monitoring on a semiannual basis for a period of three years. The SVE system is no longer recovering any mass from the vadose zone, and will not be operated as part of the post closure care.

